

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

QJR, LLC,

Plaintiff

Versus

CASE NO 1:24-cv-00383-TBM-RPM

SECURIX, LLC, and
JONATHAN MILLER, INDIVIDUALLY
AND AS CHAIRMAN OF SECURIX LLC,

Defendants

MOTION TO FILE STATE COURT RECORD UNDER RESTRICTION

NOW INTO COURT through undersigned counsel come defendants Securix, LLC and Jonathan Miller individually and in his capacity as chairman of Securix, LLC, and hereby move and represent as follows:

(1)

On or about December 20, 2024 Defendants filed a Notice of Removal.

(2)

The state court has entered an *ex parte* order sealing the entire state court record, and in order to avoid violation of the order of the state court, your defendants respectfully ask this Honorable Court to order that the State Court Record be filed under restriction so that only this Honorable Court and parties to the case can view this record. Exhibit A, State Court Record, which is not attached pending an order to file it under restriction.

WHEREFORE defendants SECURIX, LLC and JONATHAN MILLER,
INDIVIDUALLY AND AS CHAIRMAN OF SECURIX LLC respectfully ask that this

Honorable Court order that State Court Record be filed under restriction so that it can be viewed only by this Honorable Court and by the parties to this litigation.

Respectfully submitted, this the 2nd day of January, 2025.

SECURIX, LLC and
JONATHAN MILLER, individually and
as Chairman of SECURIX, LLC

/s Albert R. Jordan, IV

ALBERT R. JORDAN, IV

MS Bar Roll # 102513

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CERTIFICATE OF SERVICE

I do certify that I have this date, January 2, 2025, mailed through the United States Postal Service, postage prepaid, a true and correct copy of the above and forgoing to the following:

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/s/ Albert R. Jordan, IV
ALBERT R. JORDAN, IV